

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(1) HOMERO ZAMORANO JR.,
(4) FELIPE ORDUNA-TORRES,
(7) ARMANDO GONZALES-ORTEGA,**

Defendants.

§
§
§
§
§
§
§
§
§
§
§

SA-22-CR-366-OLG

NOTICE OF EXPERT WITNESSES

The United States hereby notifies Defendants Homero Zamorano, Felipe Orduna-Torres, and Armando Gonzales-Ortega that the following witnesses will provide expert testimony in accordance with Federal Rule of Evidence 702:

1. HSI Special Agent Jansen Jones – Alien Smuggling Organization Expert

Homeland Security Investigations Special Agent Jensen Jones will explain how alien smuggling organizations operate, including the structure and organization of alien smuggling enterprises and the means and methods employed by individuals transporting and harboring illegal aliens. A copy of Agent Jones' curriculum vitae has been provided to the defense, along with a detailed disclosure he approved that includes a complete statement of all opinions the Government intends to elicit from him and the bases and reasons supporting those opinions.

2. Dr. Kimberly Molina – Medical Examiner

Bexar County Chief Medical Examiner Kimberley Molina oversaw the autopsies performed on the 53 deceased from June 27, 2022. A copy of Dr. Molina's curriculum vitae along with the autopsy reports summarizing her testimony have been provided to the defense (ME Report

numbers 22-1722 through 17-1774). Dr. Molina will testify to the manner of investigation, scene documentation and property collected, identification of the deceased, and medical conclusions reached, including an explanation of hypothermia.

3. FBI Special Agent Sean Mullen – Cell Phone Analysis

Special Agent Sean Mullen will testify to how cellular telephones communicate with cell towers and how the tower and sector utilized provides general location information for the telephone. He has conducted historical call detail record analysis on several phone numbers associated with this case and will testify regarding the general location of each respective cell phone at specific times on various dates.

The raw data supporting Agent Mullen's analysis has previously been provided as part of discovery. A copy of Agent Mullen's curriculum vitae and an updated presentation detailing his analysis has been provided to the defense.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

/s/

ERIC J. FUCHS
Assistant United States Attorney
Texas Bar No. 24059785
601 NW Loop 410, Suite 600
San Antonio, Texas 78216
(210) 384-7445

/s/

SARAH SPEARS
Assistant United States Attorney
Texas State Bar No. 24117197
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

/s/

AMANDA BROWN
Assistant United States Attorney
Texas State Bar No. 24057776
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2024, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to counsel of record.

/s/

ERIC J. FUCHS
Assistant United States Attorney